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U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

February 4, 2021

BY ECF

Honorable Robert W. Lehrburger United States Magistrate Judge United States Courthouse 500 Pearl Street, Room 1960 New York, NY 10007

Re: The New York Times Company v. U.S. Department of State et al., 19 Civ. 9420 (RWL)

Dear Judge Lehrburger:

This Office represents the Department of State (the "State Department") and the Department of Justice (the "DOJ"), in the above-captioned Freedom of Information Act lawsuit. I write respectfully on behalf of all parties to provide a status update pursuant to the Court's January 5, 2021 Order, *see* Dkt. No. 52.

Defendants have completed production of responsive, non-exempt records. The parties have been in discussion about certain redactions in those productions. The parties anticipate resolving these discussions without motion practice, but may require up to two weeks to do so. Accordingly, the parties respectfully request that no briefing scheduled be entered at this time and that the parties submit a stipulation of dismissal or another status letter no later than February 18, 2021.

We thank the Court for its consideration of and attention to this matter.

Respectfully submitted,

AUDREY STRAUSS United States Attorney for the Southern District of New York

By: /s/ Lucas Issacharoff

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